

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case Number 19-cr-20652

v.

Honorable David M. Lawson

JAMES LETKO, STEVEN KING,
RAMI LAZECKI, PATRICIA FLANNERY
and KATHERINE PETERSON

Defendants.

JAMES LETKO’S MOTION TO AMEND THE RELEASE CONDITIONS

Defendant James Letko, through counsel, respectfully requests that this Court amend the release conditions Dkt. #13 in order to allow him to have limited contact with witnesses for business purposes only. In support of this Motion, Mr. Letko states that:

1. Mr. Letko was charged in one count of a six-count indictment returned on September 26, 2019.

2. At the arraignment hearing on October 1, 2019, Magistrate Judge Steven Whalen imposed standard condition 7(h) which states that Mr. Letko should “avoid all contact, directly or indirectly, with any person who is or may become a victim or witness in the investigation or prosecution, including but not limited to:”.

The “Other persons” box is checked and typed into that line it states: “co-defendants unless in the presence of counsel or business purposes.”

4. Thus, Mr. Letko is permitted to have contact with co-defendants for business purposes, however he is not technically permitted to have contact with (potential) witnesses for those same purposes.

5. The intent of the bond condition is clear; that is, to prevent a defendant from discussing aspects of this criminal case with any person be they co-defendants, witnesses or otherwise. And, Mr. Letko understands that.

6. However, Mr. Letko does need to accomplish certain business related purposes including but not limited to corporate tax returns and the need to have contact with certain witnesses, particularly who previously worked in Finance is necessary.

7. Pursuant to the local rules, Counsel for Mr. Letko sought concurrence from the Government in this Motion and the Government consents to the relief requested.

WHEREFORE, based on the foregoing and the attached Memorandum in support of this Motion, Defendant seeks an Order from this Court amending Item 7(h) of the conditions of release to add “and witnesses” after “co-defendants” in the typed in portion of the Order Setting Conditions of Release Dkt. #13. *See* Exhibit 1.

Respectfully submitted,

BUTZEL LONG

/s/ George Donnini

George Donnini (P66793)

Theodore R. Eppel (P81492)

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Bloomfield Hills, MI 48304

(313) 225-7042

E-mail: donnini@butzel.com

Counsel for Defendant James Letko

Dated: May 27, 2020

CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2021 I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification to counsel of record.

/s/ George Donnini

Counsel for Defendant James Letko

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